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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
 Plaintiff,  
  
 vs.  
  
 DARRYL JULIUS POLO,  
  
 Defendant.

Case No: 2:22-cr-30-RFB-DJA

**STIPULATION AND ORDER**  
**TO DELAY SURRENDER AND REPORT**  
**DATE (Seventh Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through MATTHEW R. GALEOTTI, Supervisory Official for the Criminal Division, MATTHEW A. LAMBERTI, Senior Counsel, SIGAL CHATTAH, United States Attorney, JESSICA OLIVA, Assistant United States Attorney, and DARRYL POLO, by and through his attorney, RICHARD E. TANASI, ESQ., that the date by which Mr. Polo must surrender to outstanding warrants after the conclusion of the trial in this matter and report to his term of imprisonment in the instant case, now scheduled for August 4, 2025 (ECF No. 670), be vacated and continued to a date sixty (60) days from the date of the last sentencing in this case, currently set for September 4, 2025 (ECF No. 675).

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1 This Stipulation is entered into for the following reasons:

2 1. Mr. Polo has been under conditions of release since September 29, 2019. Eastern  
3 District of Virginia (“EDVA”) ECF (19-cr-253-MSN). No. 59. On May 7, 2021, he was  
4 sentenced to 57 months in prison on four counts related to criminal copyright infringement and  
5 one count of money laundering. EDVA ECF 498 and 500.  
6

7 2. On May 24, 2021, after a consent motion filed by Mr. Polo, Judge Ellis in EDVA  
8 ordered Mr. Polo to surrender to any outstanding warrants no later than September 7, 2021 and  
9 self-report to his term of imprisonment after September 7, 2021. EDVA No. 515.  
10

11 2. On August 23, 2021, after a consent motion filed by Mr. Polo, Judge Ellis in  
12 EDVA ordered Mr. Polo to surrender to any outstanding warrants no later than February 1, 2022  
13 and self-report to his term of imprisonment after February 1, 2022. EDVA No. 666.  
14

15 3. On January 5, 2022, after a consent motion filed by Mr. Polo, Judge Nachmanoff  
16 in EDVA ordered Mr. Polo to surrender to any outstanding warrants no later than July 18, 2022  
17 and self-report to his term of imprisonment after July 18, 2022. EDVA No. 740.  
18

19 4. On March 31, 2022, after a consent motion filed by Mr. Polo, Judge Gordon  
20 ordered Mr. Polo to surrender to any outstanding warrants no later than seven (7) days following  
21 the conclusion of the trial in this matter, and to self-report to his term of imprisonment after the  
22 date that he surrenders to any warrants. ECF No. 27.  
23

24 5. On November 19, 2024, after a stipulation filed by Mr. Polo and the government,  
25 this Court ordered Mr. Polo to surrender to any outstanding warrants no later than April 7, 2025,  
26 and to self-report to his term of imprisonment after the date that he surrenders to any warrants.  
27 ECF No. 646.  
28

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1           6.       On February 3, 2025, after a stipulation filed by Mr. Polo and the government, this  
2 Court ordered Mr. Polo to surrender to any outstanding warrants no later than August 4, 2025,  
3 and to self-report to his term of imprisonment after the date that he surrenders to any warrants.  
4 ECF No. 670.

5           7.       The additional time requested herein is sought to allow Mr. Polo time to  
6 comply with the terms of his guilty plea agreement, and to allow the government time to evaluate  
7 whether it intends to file a Motion for a Reduced Sentence under F.R.Crim.P 35(b)(2). The  
8 additional time is not sought for purposes of delay.  
9

10           **WHEREFORE**, the parties respectfully request that this Honorable Court accept the  
11 Stipulation and enter an Order as set forth below, continuing Mr. Polo's surrender and report  
12

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14 ///

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1 date in the above-captioned matter to a date sixty (60) days from the date of the last sentencing  
2 in this case, currently set for September 4, 2025. ECF No. 675.

3 DATED this 10<sup>th</sup> day of June, 2025.

4  
5 /s/ Matthew A. Lamberti

6 MATTHEW R. GALEOTTI

7 Supervisory Official for the Criminal Division

8 MATTHEW A. LAMBERTI

9 Senior Counsel

10 MICHAEL CHRISTIN

11 Trial Attorney

12 Computer Crime and Intellectual Property Section

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19  
20 /s/ Jessica Oliva

21 SIGAL CHATTAH

22 United States Attorney

23 Jessica Oliva

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/s/ Richard Tanasi

RICHARD E. TANASI, ESQ.

Attorney for the Defendant

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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA  
3

4 UNITED STATES OF AMERICA,  
5 Plaintiff,  
6 vs.  
7 DARRYL JULIUS POLO,  
8 Defendant.

Case No: 2:22-cr-30-RFB-DJA

**ORDER TO DELAY SURRENDER AND**  
**REPORT DATE**  
**(Seventh Request)**

9 This matter coming before the Court on a Stipulation To Delay Surrender And Report  
10 Date, the Court having considered the matter, and good cause showing, the Court accepts the  
11 Stipulation.  
12

13 **WHEREFORE, IT IS ORDERED THAT** the defendant shall surrender to any  
14 outstanding warrants no later than sixty (60) days from the date of the last sentencing in this  
15 case, currently set for September 4, 2025, (December 4, 2025) ECF No. 675, and shall  
16 self-report to his term of imprisonment after the date that he surrenders to any warrants.  
17

18 **IT IS FURTHER ORDERED THAT** all conditions of release set forth in the September  
19 25, 2019 Order remain in effect. [See, United States District Court for the Eastern District of  
20 Virginia, 1:19-cr-00253-MSN, ECF 59.]  
21

22 

23 HON. RICHARD F. BOULWARE, II  
24 UNITED STATES DISTRICT JUDGE

25 DATED: 6/11/2025  
26  
27  
28

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**CERTIFICATE OF ELECTRONIC SERVICE**

I HEREBY CERTIFY that I am an employee of Tanasi Law Offices, that on the 10<sup>th</sup> day of June 2025, the undersigned served a true and correct copy the foregoing **STIPULATION AND ORDER** by U.S. District Court CM/EMF Electronic Filing to all parties in this case.

*/s/ Richard Tanasi*

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An employee of TANASI LAW OFFICES

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